From: James Randall [mailto:jrrandall@communitybankiowa.com]
Sent: Thursday, March 26, 2009 3:12 PM
To: Comments
Subject: Assessments, RIN 3064-AD35

James Randall
224 East 7th Street
Logan, IA 51546-1349

March 26, 2009

Comments to FDIC

Dear Comments to FDIC:

The ICBA (Independent Community Bankers of America) suggested form letter has been scrapped; mine is shorter.

DO NOT REWARD BAD BEHAVIOR.

If any portion of the FDIC Special Assessment is placed on Non-TARP receiving banks YOU have done your job poorly, very very poorly. The failed TBTF (Too-Big-To-Fail) financial institutions [intentional oxymoron] need to be responsible for the costs of fixing of THEIR own problems. If a Special Assessment is necessary to fund FID because of the actions of the TBTF then the TBTF should shoulder the cost of their actions. FID is an insurance pool; just as drunk drivers pay hugely more than normal premiums for each conviction the TBTF should pay for ALL funding of the Special Assessment. Being classified as a TBTF is enough of a safety net; just ask any past stockholder of the 20 other banks which have been closed this year. Non-TBTF institutions should not be saddled with additional risk created by the TBTF. Help the TBTF maintain liquidity if they are truly too big to fail [I don't think so] but do NOT shift ANY ownership of their problems or the costs of their problems to the tax payers or the banks which have maintained good judgment and safety and soundness standards. Again, Do Not Reward Bad Behavior.

I would suggest that openly requiring the TBTF to be completely financially responsible for their actions would create huge returns in the increased confidence placed with the American Banking SYSTEM.

DO NOT REWARD BAD BEHAVIOR.

[Sent to: Sen.Grassley, Sen.Harkin, Rep.King, FDIC]

Very Sincerely,
James R Randall
712-644-3256